

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

VISI LNU,
GENTIAN CARA,
ALBERT TAMALI,
a/k/a "Berti,"
a/k/a "Daniel Weiss,"
MARJAN TAMALI,
JOANNA PAKULSKI,

Defendants.

COUNT ONE

The Grand Jury charges:

1. From at least in or about 2003, up to and including in or about 2007, in the Southern District of New York and elsewhere, VISI LNU, GENTIAN CARA, ALBERT TAMALI, a/k/a "Berti," a/k/a "Daniel Weiss," MARJAN TAMALI, and JOANNA PAKULSKI, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that VISI LNU, GENTIAN CARA, ALBERT TAMALI, a/k/a "Berti," a/k/a "Daniel Weiss," MARJAN TAMALI, and JOANNA PAKULSKI, the defendants, and others known and unknown, would and did

ORIGINAL

SUPERSEDING
INDICTMENT

S2 10 Cr.

10 CRIM - 464

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DOC #:
DATE FILED 5-27-10

distribute and possess with intent to distribute a controlled substance, in violation of 21 U.S.C. § 841(a).

3. The controlled substance involved in the offense was 100 kilograms and more of mixtures and substances containing a detectable amount of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B).

(Title 21, United States Code, Section 846.)

COUNT TWO


The Grand Jury further charges:

4. In or about June 2005, in the Southern District of New York, the Eastern District of New York, and elsewhere, VISI LNU, the defendant, and others known and unknown, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the offense charged in Count One of this Indictment, did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, and did aid and abet the use, carrying, and possession of firearms, to wit, the defendant and other co-conspirators not named as defendants herein obtained

and possessed firearms to protect their narcotics business and intended to use those firearms in retaliation for a robbery by other drug dealers of their narcotics and narcotics proceeds.

(Title 18, United States Code, Sections
924(c)(1)(A)(ii) and 2.)


FOREPERSON


PREET BHARARA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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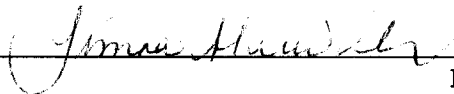
S2 INDICTMENT

(Title 18, United States Code, Sections
1959(a)(1), 924(c)(1)(A)(ii), and 2; Title
21, United States Code, Section 846).

PREET BHARARA

United States Attorney.

A TRUE BILL



Foreperson.

May 27, 2010

Filed Second Superseding Indictment.
Ordered Filed Under Seal. Freeman, USMJ

May 28, 2010

A/w's ordered for all defendants
Freeman, USMJ